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April 1, 2009

EPA Region 5 Records Ctr. 361388

Mr. Steven Faryan, On Scene Coordinator U.S. Environmental Protection Agency - Region 5 77 W. Jackson Blvd. Chicago, IL. 60604

Subject: Corrective Action Plan Addendum,

Request to Relocate Oxidizer Unit 4 to ML-6 Area

Hanover Park, Illinois, Scope of Work - AECOM Project No. 13069-002

Dear Mr. Faryan:

As discussed in our meeting on March 17, 2009, BFI and the Forest Preserve District of DuPage County are proposing to relocate one of the oxidizer units from the subdivision west of the landfill to address gas migration in the vicinity of probe ML-6. It is anticipated that a large diameter extraction well will be installed adjacent to probe ML-10i (refer to in Figure 1 for map depicting extraction well location). The well, referred to as LDE-13, will be installed to a depth of approximately 52 feet and will be instrumented with 25 feet of 6-inch diameter, No. 10 (0.010 inch) slot well screen. It is anticipated that the well will the installed utilizing 12 inch diameter air or water or rotary drilling methods and that the well will be constructed in a manner similar to the other LDE series wells completed on the west side of the landfill (Refer to Corrective Action Plan Figure 5-7). Based on preliminary monitoring conducted at probes ML-10i and ML 23 it is anticipated that unsaturated conditions prevail at the proposed location where extraction well LDE-13 will be installed As such, it is believed that the gas may be extracted from the existing vadose zone without the need for dewatering. If dewatering becomes necessary, the USEPA and IEPA will be notified.

Well LDE-13 will be equipped with a LandTech sealed blind flange wellhead as shown in Corrective Action Plan Figure 5-7. The well will be equipped with a 2-inch groundwater discharge line in case a dewatering pump is eventually added to the installation. The 4-inch diameter gas line will be connected to the internal combustion engine which will provide both a source of vacuum to extract the gas and a means to destroy/combust the gas. The internal combustion engine oxidizer will be contained in a fenced enclosure similar to those constructed around the other oxidizers. It is anticipated that the oxidizer will initially be operated as a pilot study to evaluate the feasibility of capturing the trapped gas from the sand seam near Greenbrook School. The performance data from the operation at this initial location will be utilized to determine whether any additional extraction well locations are required. Additionally, the data will be evaluated to assess whether the oxidizer operations are capable of achieving the corrective action objective (i.e., 5% LEL).

Pending approval from US EPA and the Illinois EPA, the oxidizer will be mobilized from the subdivision west of the Mallard Lake Landfill as soon as the well (LDE-13) is completed. At present, it is anticipated that oxidizer Unit 4 which is presently operating at well LDE-12 will be the first unit to become available. The gas concentrations will continue to be monitored on a biweekly basis as required by the Corrective Action Plan, even after the oxidizer unit has been relocated. If necessary, one of the oxidizers can be periodically moved back to the LDE-12 location if additional methane is noted at any of the monitoring probes in this area.

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On Monday March 23, AECOM contacted IEPA Bureau of Air and discussed the potential relocation of the oxidizer unit, in order to determine if any additional permitting was required. Based on conversations with Mr. Kunj Patel, AECOM was informed that no additional permitting was required to relocate the oxidizer at a new location. However IEPA requested that a letter be provided to notify them that the oxidizer unit was being relocated. As such, IEPA Bureau of Air and Land are being copied on this request for approval for the oxidizer relocation. It is anticipated that a notification will also be provided which details the precise schedule for installing well LDE-13 and operating the oxidizer unit.

Should you have any questions on the above request, please do not hesitate to contact Craig Rawlinson at (847) 279-2500.

Sincerely,

Steve C. Kornder, PhD. Senior Geochemist

Associate Hydrogeologist

CC:

Jim Hitzeroth, BFI Waste Systems, Inc.

Eric Ballenger, Allied Waste Industries, Inc.

Joe Benedict, Forest Preserve District of DuPage County

Kunj Patel, IEPA, Bureau of Air Tom Rivera, IEPA, Bureau of Land Christine Roque, IEPA, Bureau of Land

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